

WHISTLEBLOWER POLICY

Project Kompass, Incorporated (the “Corporation”) expects its directors, officers, employees, and volunteers to observe high ethical standards and to comply with applicable laws and regulations in the conduct of their duties. This Whistleblower Policy (this “Policy”) describes the process for individuals to submit complaints regarding the quality and integrity of the Corporation’s accounting, auditing, and financial reporting controls and procedures as well as the Corporation’s legal or regulatory compliance (“Compliant”). Any director, officer, employee, or volunteer who violates or suspects any violation of the law, regulations, ethical rules, or any policy of the Corporation must report such activity as soon as possible by submitting a Complaint.

Complaints may be submitted to the President, who will promptly forward any such Complaints to the board of directors (“Board of Directors” or “Board”). Complaints may also be submitted directly to the Board. Complaints must be in writing and include a full statement of the acts of omissions, along with relevant dates, forming the basis of the Complaint. Complaints should state that they are made pursuant to this Policy. In order to facilitate an investigation, individuals submitting Complaints should include their contact information. Individuals may also submit Complaints on an anonymous basis. The Corporation will use its best efforts to maintain the anonymity of any such Complaint, but an investigation may result in the identification of the individual.

To submit a Complaint to the President, send it to the following address:

**Project Kompass, Incorporated
83 Middlesex Street
North Chelmsford, MA 01863**

To submit a Complaint to the Board, send it in a sealed envelope to the chairperson of the Board of Directors either at that individual’s place of work, as listed in the Board roster, or to the Corporation’s address above.

The Board will investigate every Complaint and take or recommend corrective and disciplinary actions, if appropriate. The Board may enlist employees of the Corporation and/or outside legal, accounting, or other advisors, as appropriate, to conduct any investigation of Complaints. The Board will retain and maintain a record of all Complaints received by it and the President pursuant to this Policy and the results of the investigations. Confidentiality will be maintained throughout the investigation to the extent reasonable and practicable under the circumstances, and consistent with appropriate investigative and corrective action.

A copy of this Policy shall be distributed to all directors, officers, employees, and volunteers who provide substantial services to the corporation.

The Corporation does not permit retaliation or discrimination of any kind against any individual for Complaints submitted pursuant to this Policy that are made in good faith.